

EXHIBIT

V

Shelly Bloor

From: Will Cochran
Sent: Wednesday, February 26, 2020 4:48 PM
To: Chris Williams
Subject: FW: Depos

From: Horton, Odell <ohorton@wyattfirm.com>
Sent: Tuesday, February 18, 2020 2:44 PM
To: MMclaren <MMclaren@blackmclaw.com>; Craddock, Bob <rcraddock@wyattfirm.com>
Cc: Brice Timmons <btimmons@blackmclaw.com>; fwatson@watsonburns.com; Will Cochran <wcochran@blackmclaw.com>; wroutt@watsonburns.com; bburns@watsonburns.com; Lee Whitwell (lee.whitwell@shelbycountyttn.gov) <lee.whitwell@shelbycountyttn.gov>; Horton, Odell <ohorton@wyattfirm.com>
Subject: RE: Depos

Mike,

Shelby County wants to understand Plaintiffs' positions before answering your question. It is our understanding Plaintiffs will withdraw their 30(b)(6) Deposition Notice to Shelby County. It is also our understanding Plaintiffs would issue new deposition notices to the Shelby County employees with the understanding their depositions are for class certification purposes only and Plaintiffs would limit their questions to class issues. Please let me know if my understanding is correct regarding these issues.

Thank you.

Odell

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP
Direct: (901) 537-1082

From: MMclaren@blackmclaw.com <MMclaren@blackmclaw.com>
Sent: Monday, February 17, 2020 3:55 PM
To: Craddock, Bob <rcraddock@wyattfirm.com>; Horton, Odell <ohorton@wyattfirm.com>
Cc: btimmons@blackmclaw.com; fwatson@watsonburns.com; wcochran@blackmclaw.com; wroutt@watsonburns.com; bburns@watsonburns.com
Subject: Depos

Bob, Odell, you have several Depo notices – do you intend to produce anyone on the dates noticed. Just a simple yes or no please.

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